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October 2, 2019

**VIA ECF**

Honorable Cathy Seibel  
United States District Court  
Southern District of New York  
300 Quarropas St.  
White Plains, NY 10601-4150

Re: Berger v. Imagina Consulting, 7:18-cv-08956 (CS-JCM)

Dear Judge Seibel:

We represent Plaintiff Jason Berger in the above-captioned case. We write to respectfully request an in-person conference, at the Court's convenience, to address the Court's order dated September 27, 2019 [Dkt. #53] in which the Court imposed sanctions on Plaintiff's counsel. (the "Order")

For just cause, we also respectfully request that the Court stay the Order until such time as a conference is held before Your Honor.

We appreciate Your Honor's consideration in this matter.

Respectfully Submitted,

**/Richard Liebowitz/**  
Richard Liebowitz

*Counsel for Plaintiff Jason Berger*